

From: Dunderdale, Chris <Chris.Dunderdale@lancashire.gov.uk>
Sent: 17 March 2016 11:58
To: planning
Subject: RE: Consultation on Planning Application 3/2016/0146 Old Row Whalley Road Barrow BB7 9AZ

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

FAO Robert Major

Good morning,

Thank you for inviting us to comment on the above application. Unfortunately, The Lead Local Flood Authority (LLFA) is currently unable to provide you with a substantive response for the following reasons:

- a) **Discrepancies over the size of the proposed development:** The application form submitted by the applicant indicates that the site is 00.96ha in size, however, sections 1.2 and 2.2 of the flood risk assessment (Ref: '46648', Dated: 'February 2016'; By: 'AAH planning consultants') indicate that the site is actually in excess of 1ha (1.16ha). We are concerned by this as the size of the site can significantly affect whether or not the proposal complies with national planning policy.

The reason for this is that, under Footnote 20 of Paragraph 103 of the National Planning Policy Framework (NPPF), a site specific flood risk assessment is required for sites larger than 1ha in size. Whilst it is recognised that a flood risk assessment has been submitted by the applicant, the flood risk assessment fails to consider the risk of flooding from all sources and for that reason, it is deemed to be inadequate.

Should a flood risk assessment be required therefore, i.e. if the site is over 1ha in size, then this is likely to result in an objection on the grounds of an inadequate flood risk assessment. However, should a flood risk assessment not be required, i.e. if the site is under 1ha in size, then this is unlikely to result in an objection on these grounds as it is not technically contrary to national planning policy.

Before we are able to provide a substantive response to this consultation, we would require clarification over the actual size of the proposed development. For consistency, the application form and flood risk assessment should be amended accordingly. **Please note that we would also expect that any amendments should include an account of the recent floods (Nov 2015 – Feb 2016) and whether the site was affected.**

- b) **Discrepancies over the method of surface water disposal:** The application form submitted by the applicant indicates that they intend to dispose of surface water via a sustainable drainage system, soakaway and mains sewer. However, section 3.4 of the flood risk assessment indicates that the preferred intention is actually to dispose of surface water via an open land drain (watercourse) which flanks the southern site boundary. We are concerned by this as the method of surface water disposal can significantly affect whether or not the proposal complies with planning policy.

Should the applicant intend to dispose of surface water via a soakaway and mains sewer, as noted on the application form, then this is likely to result in an objection for the following reasons.

- a) Section 4.2 of the flood risk assessment indicates that infiltration is unlikely to be possible due to ground conditions and therefore, the use of soakaways as a method of surface water disposal is unlikely to be possible.
- b) The applicant has failed to provide robust justification or evidence as to why preferable runoff destinations (ie. a watercourse / surface water body) cannot be utilised instead of a mains sewer. This is contrary to planning practice guidance which establishes a hierarchy for surface water disposal. Generally, the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:
 - into the ground (infiltration);
 - to a surface water body;
 - to a surface water sewer, highway drain, or another drainage system;
 - to a combined sewer.

Should the applicant intend to dispose of surface water via a sustainable drainage system and watercourse, as noted in the flood risk assessment, then this is likely to be considered as an acceptable method of surface water disposal; subject to obtaining land drainage consent and subject to infiltration tests (that prove infiltration is not possible), hydraulic calculations and evidence that sufficiently demonstrates the suitability (i.e. condition, capacity and discharge point) of the receiving watercourse.

Before we are able to provide a substantive response to this consultation, we would require clarification over the proposed method of surface water disposal for the proposed development. We would also require an indicative site drainage plan that shows the location of any proposed sustainable drainage systems and proposed outfall locations. For consistency, the application form and flood risk assessment should be amended accordingly.

- c) **Discrepancies over the application form:** Section 5 of the application form indicates that the proposal is **NOT** within 20m of a watercourse, however, section 4.5 of the flood risk assessment indicates that there is an ordinary watercourse adjacent to the southern border of the plot. This is located within 20m of the proposed development.
- d) **Insufficient information submitted – hydraulic calculations:** Section 4.5 of the flood risk assessment indicates that the hydraulic calculations provided (ie. discharges rates and on site storage requirements) are based on an impermeable area (hardstanding) of 0.57ha. This accounts for roughly half of the proposed development site. Whilst it is recognised that the remainder of the site is proposed to be comprised of soft landscaped areas, section 4.2 of the FRA indicates that it is unlikely that infiltration would be possible due to the ground characteristics. This would suggest therefore, that 100% of the proposed site would in fact be impermeable. As a result, the applicant has failed to account for roughly half of the site in their hydraulic calculations.

Before we are able to provide a substantive response to this consultation, we would require the applicant to provide hydraulic calculations (greenfield runoff, discharge rates and online storage requirements) which take in to account 100% of the proposed development. For consistency, the flood risk assessment should be amended accordingly.

- e) **Insufficient information submitted – detailed location and layout plans:** The applicant does not appear to have submitted any plans showing any existing surface water flow routes, drains, sewers and watercourses.

We would ask to be re-consulted on any amended flood risk assessments and/or drainage strategies for this site. We will then provide you with comments within 21 days of formal re-consultation.

Should you require any clarification on the above information, then please feel free to contact me directly on 01772 534593.

Many thanks,

Chris

Chris Dunderdale
Flood Risk Management Officer
Community Services
Lancashire County Council
T: 01772 534593
W: www.lancashire.gov.uk

From: Lowe, Elizabeth
Sent: 26 February 2016 13:44
To: Suds <suds@lancashire.gov.uk>
Subject: FW: Consultation on Planning Application 3/2016/0146 Old Row Whalley Road Barrow BB7 9AZ

From: Emma Thompson [<mailto:emma.thompson@ribblevalley.gov.uk>]
Sent: 26 February 2016 13:10
To: 'parish.council@wiswell.plus.com' <parish.council@wiswell.plus.com>; 'barrowparishcouncil@gmail.com' <barrowparishcouncil@gmail.com>; Countryside <countryside@ribblevalley.gov.uk>; Stephen Kilmartin <Stephen.Kilmartin@ribblevalley.gov.uk>; LHS Customer Service <lhscustomerservice@lancashire.gov.uk>; planning.liaison@uuplc.co.uk; CLPlanning@environment-agency.gov.uk; Lowe, Elizabeth <Elizabeth.Lowe@lancashire.gov.uk>
Subject: Consultation on Planning Application 3/2016/0146 Old Row Whalley Road Barrow BB7 9AZ

Please will you let Robert Major have your comments within 21 days on the above planning application (please respond to planning@ribblevalley.gov.uk F.A.O Robert Major)

The application is for: Outline application with all matters reserved for residential development of 23 dwellings , with access, parking and associated landscaping following demolition of Nos.23 25 Old Row

Here is a link to view the application on our website
https://www.ribblevalley.gov.uk/site/scripts/planx_details.php?appNumber=3%2F2016%2F0146

Thinking about **adoption**? Get in touch and we'll support you all the way.

Worried about changes in someone's memory or behaviour? Visit
www.lancashire.gov.uk/dementia for information, advice and support.

This e-mail contains information intended for the addressee only.

It may be confidential and may be the subject of legal and/or professional privilege.

If you are not the addressee you are not authorised to disseminate, distribute, copy or use this e-mail or any attachment to it.

The content may be personal or contain personal opinions and unless specifically stated or followed up in writing, the content cannot be taken to form a contract or to be an expression of the County Council's position.

Lancashire County Council reserves the right to monitor all incoming and outgoing email.

Lancashire County Council has taken reasonable steps to ensure that outgoing communications do not contain malicious software and it is your responsibility to carry out any checks on this email before accepting the email and opening attachments.